

STATE OF NEW YORK
YOUTH PART OF THE SUPERIOR COURT
COUNTY OF MONROE

-----X
:
THE PEOPLE OF THE STATE OF NEW YORK :
:
-against- :
:
[REDACTED] :
:
Defendant. :
-----X

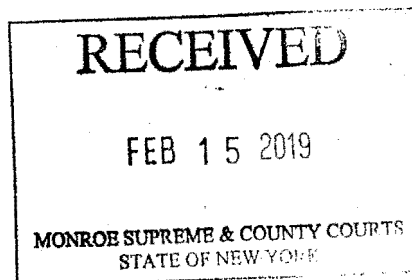
FYC-7003-19/001
CR # 19-003418
Indct. # 0099/19

**NOTICE OF
MOTION** #1

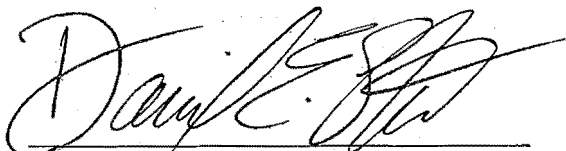
PLEASE TAKE NOTICE that upon the annexed Affirmation of Daniel E. Strollo, the exhibits thereto, and upon all other papers and proceedings heretofore had herein, the People will move this Court, situate at the Hall of Justice, 99 Exchange Boulevard, Rochester, New York on February 15, 2019 at 4:00 in the afternoon thereof, or as soon thereafter as counsel may be heard, for an Order pursuant to CPL § 722.23(1), et seq. preventing removal of this action to Family Court.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPL § 722.23(1)(b), the People request a hearing upon the within motion.

Dated: Rochester, New York
February 15, 2019



SANDRA DOORLEY, ESQ.
District Attorney of Monroe County

By: 
DANIEL E. STROLLO, ESQ.
Senior Assistant District Attorney

TO: Christopher K. Rodeman, Esq.
Attorney for the Defendant
1081 Long Pond Road, Suite 200
Rochester, New York 14626-5002

STATE OF NEW YORK
YOUTH PART OF THE SUPERIOR COURT
COUNTY OF MONROE

-----X	FYC-7003-19/001	
:	CR # 19-003418	
THE PEOPLE OF THE STATE OF NEW YORK	:	Indct. # 0099/19
:		
-against-	:	<u>AFFIRMATION</u>
:		
[REDACTED]	:	
:		
Defendant.	:	
-----X		

DANIEL E. STROLLO hereby affirms the following to be true under the pains and penalties of perjury pursuant to CPLR § 2106:

1. I am a Senior Assistant District Attorney in and for the County of Monroe, State of New York. In that capacity, I am responsible for prosecuting the above – captioned action. I am fully familiar with the facts and circumstances set forth herein.

2. Unless otherwise explicitly stated, the factual allegations set forth in this Affirmation are based upon information and belief, the source of that information and basis for that belief consists of my discussions with knowledgeable parties; the papers filed in connection with this matter; police reports; and any other reports and papers contained in the file of the Monroe County District Attorney's Office.

3. I submit this Affirmation in support of the People's Motion to prevent removal of this action to Family Court, pursuant to CPL § 722.23(1).

PROCEDURAL BACKGROUND

4. [REDACTED] (hereinafter the "Defendant") was originally charged by Felony Complaint with three counts of Criminal Possession of a Weapon in the First Degree, PL § 265.04(1); and Conspiracy in the Fourth Degree, PL § 105.10(1). The Felony Complaints are collectively annexed hereto and made part hereof as "Exhibit A."

5. The Defendant is an "Adolescent Offender" because he was sixteen years old when he committed the crimes for which he was charged, and because those crimes are felonies. CPL § 1.20(44). The top count, Criminal Possession of a Weapon in the First Degree, PL § 265.04(1), is a violent felony offense. PL § 70.02(1)(b). As such, subsequent to his arraignment in the Youth Part, a "6 – day review" was held, and the Court determined that this action shall proceed in accordance with CPL § 722.23(1) because the parameters of CPL § 722.23(2)(c) are not met by the facts of this case.

6. Subsequent to the last court appearance in this matter, the Grand Jury of the County of Monroe returned an Indictment against the Defendant, charging him and his co-conspirators with the following six felony offenses: Criminal Possession of a Weapon in the First Degree as a Crime of Terrorism (two counts), PL §§ 264.04(1), 490.25(1); Attempted Criminal Possession of a Weapon in the First Degree as a Crime of Terrorism, PL §§ 110.00, 264.04(1), 490.25(1); Conspiracy in the Second Degree as a Crime of Terrorism, PL §§ 105.15, 490.25(1); Conspiracy in the Fourth Degree as a Crime of Terrorism, PL §§ 105.10(1), 490.25(1); and Conspiracy in the Fourth Degree, PL § 105.10(1). A true copy of the Indictment is annexed hereto and made part hereof as "Exhibit B."

7. The People have reviewed the evidence in this case, considered the Defendant's conduct, and considered the Defendant's history, character, and condition. As a result of that review, the People respectfully submit that extraordinary circumstances exist that should prevent the transfer of this action to Family Court, and move this Court accordingly.

THE DEFENDANT'S CRIMINAL ACTS

8. Between September 13, 2018 and January 18, 2019, the Defendant and his acquaintances Vincent Vetromile, Brian Colaneri, and Andrew Crysel (individually or

collectively referred to as the Defendant's "co-conspirators") communicated through various methods, including a service known as "Discord." Discord is an end-to-end messaging application frequently used by video game enthusiasts. When using Discord, the Defendant and his co-conspirators communicated principally, if not exclusively, on two channels entitled "#militia-soldiers-wanted," and "#leaders-only."

9. Using Discord, the Defendant and his co-conspirators discussed their views of domestic events and policy. One theme resonates through these discussions: the Defendant and his co-conspirators desired and intended to attack civilian members of a community known as "Islamberg," because the Defendant and his co-conspirators believed that as practitioners of the Islamic faith, the members of this community were automatically terrorists. To this end, the Defendant and his co-conspirators discussed the objectives of such an attack, the manner in which that attack would be carried out, the weapons that would be used in that attack, and other similarly disturbing subjects. Further, the Defendant and his co-conspirators discussed logistical challenges that they would need to overcome, how they would finance their attack, and even went so far as to discuss scheduling their attack. Their collective intention was clear: kill as many members of the "Islamberg" community as possible.

10. The Defendant and his co-conspirators' actions were not limited to idle talk. As is set forth in the Indictment, these individuals actually acquired and possessed explosive materials including black powder, sketches of bombs, ammunition, loaded magazines, and twenty two (22) guns of various calibers.

11. In approximately November of 2018, the Defendant had a friend (hereinafter referred to as "T.A.") over to his house on Milford Street. During this visit, the Defendant showed T.A. a "prototype bomb" and explained that it did not contain any black powder.

Shortly thereafter, the Defendant showed T.A. a container of black powder. According to T.A., the Defendant explained that Vincent Vetromile asked him to manufacture this device. T.A.'s Supporting Deposition is annexed hereto and made part hereof as "Exhibit C."

12. On January 18, 2019, members of Law Enforcement executed a search warrant at the Defendant's residence, 58 Milford Street, Greece, New York. Their findings were stunning. Three items appearing to be bombs were recovered inside the Defendant's residence. Subsequently, these three devices were analyzed by the Federal Bureau of Investigation ("F.B.I.") Laboratory Division in Quantico, Virginia. The results of the F.B.I.'s analysis are set forth in a February 7, 2019 Laboratory Report, a redacted copy of which is annexed hereto and made part hereof as "Exhibit D."

13. The F.B.I. Report indicates that two of the devices are Improvised Explosive Devices, and one is a partially assembled Improvised Explosive Device. The results of the examination set forth in the F.B.I. Report are as follows: "[two] of the submitted IEDs (Item 1 and Item 3) are complete IEDs with an explosive main charge, non-electric fuzing system, and confinement container." See: Exhibit D at Page 2. The report further indicates that "[one] of the submitted IEDs (Item 2) has residual explosive material in the main charge container, a non-electric fuzing system and a confinement container." Id.

14. The F.B.I. Report provides insight into the deadly nature of each of these three weapons: "properly assembled and initiated, **these types of devices are capable of causing property damage, personal injury, and/or death.**" [emphasis added] Id. The Report goes on to state that "[each] of these IEDs incorporates a confinement container. The purpose of a confinement container is to hold the low explosive main charge and to temporarily contain the gases produced from the deflagration of the low explosive. An explosion of the container occurs as the container is overcome by the amount of pressure

generated from the reaction. The resulting explosion of these containers would have resulted in container fragments being propelled outward at high velocities. [emphasis added] See: Exhibit D at Page 3.

EXTRAORDINARY CIRCUMSTANCES

15. If ever there were a case where extraordinary circumstances exist, surely this is it. The facts of this case and the applicable law all but command this Court to enter an order preventing removal of this action to Family Court.

16. The Raise the Age legislation brought about in the State's 2017 Budget only recently went into effect. As a result, at present, there are only three reported decisions addressing the extraordinary circumstances analysis mandated by CPL Article 722. Yet, even the most lenient interpretations of this new law support People's position in the instant case. In December of 2018, the Honorable Joan S. Kohout (this Court's predecessor in the Youth Part) decided the matter of People v. D.L., 2018 N.Y. Slip Op. 28419 (Family Ct. Monroe Co. 2018). In D.L., the Court assessed the facts of the case, looking for "highly unusual or heinous facts" and ultimately characterized the defendant's acts as being "the type of impulsive act done without thought of consequences." Id.

17. Here, the Defendant's acts and intentions are *unquestionably heinous*; the Defendant conspired to injure, maim, and kill as many members of "Islamberg" as possible – solely because of their religious beliefs. Such conduct offends the bedrock principles underpinning our nation, and constitutes a unique breed of evil.

18. This case in its totality is indeed *highly unusual*; even in adult cases, it is exceptionally rare for individuals to conspire to commit acts of domestic terrorism. Indeed, this case marks the first (and hopefully the last) time an individual has been indicted for a Crime of Terrorism under PL Article 490 in Monroe County.

19. The Defendant's conduct is *hardly impulsive*. The Defendant constructed two fully functional explosive devices (and one almost functional explosive device). Rare is the defendant who is capable of even designing what this Defendant successfully constructed. Even standing alone, the very act of building a bomb takes research, planning, skill, and decisive criminal intent. One must learn how to construct an explosive device, acquire the necessary materials, and then assemble the constituent parts – a multi-step time consuming process. Among the items observed and recovered at the Defendant's residence were sketches of bombs, further reflecting the Defendant's thoughtfulness and planning. The Defendant's bomb manufacturing, however, does not stand alone. Rather, it must be viewed in the context of the conspiracy's plan to kill the Muslim inhabitants of Islamberg. The Defendant and his co-conspirators discussed the particulars of their attack on Islamberg over a period spanning several months. The conspiracy involved thoughtful planning during this time period, and a discussion of potential logistical, tactical, and financial obstacles that the conspirators would need to grapple with. Every act taken in furtherance of the conspiracy evinces decisive and thoughtful contemplation and planning – no part of it could be characterized as impulsive.

20. The Defendant will inevitably argue that his conduct was childish, immature, or otherwise the result of youthful indiscretion. No reasonable view of this case agrees with that conclusion. This is not a case of a young man playing with firecrackers in his back yard; this is not the case of a young man who merely sketched a bomb; and this is not the case of a young man espousing hateful beliefs. In reality, the only thing that stood between the Defendant's creations and mass casualty was a lit fuse.

CONCLUSION

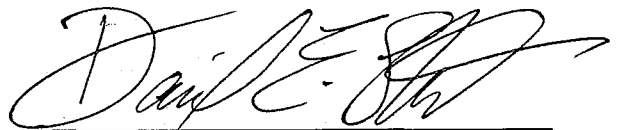
21. The acts described above are not those of a wayward child in need of counseling, therapy, or mentoring – they are the acts of a domestic terrorist who deserves to be prosecuted as such. The manner in which the Defendant committed his crimes compels a conclusion that he did not act on youthful impulse – rather, he acted with decisive criminal intent. The Court cannot allow this case to be transferred to Family Court. The People prevail upon this Court to enter an order preventing such a transfer. Justice can tolerate no other result.

READINESS

22. The People are ready for trial in this matter. People v. Kendzia, 64 N.Y.2d 331 (1985).

WHEREFORE, the People pray that this Court enter an order finding the existence of extraordinary circumstances that shall prevent the removal of this action to Family Court.

Dated: Rochester, New York
February 15, 2019



DANIEL E. STROLLO, ESQ.
Senior Assistant District Attorney

Exhibit A

The People of the State of New York
against

Defendant

08/22/02

DOB

FELONY COMPLAINT

Criminal Possession of a Weapon 1st Degree
New York State Penal Law
Section 265.04 Sub 1
Class B Felony

THAT Sergeant Brandon White Of Greece Police Department

By this FELONY COMPLAINT, makes written accusation as follows:

THAT [REDACTED] Of 58 Milford Street, Greece, NY

did, at or about 11:00 ☐ AM ☒ PM Date: January 18th, 2019

at: 58 Milford Street, Town of Greece, New York did commit the offense

of *Criminal Possession of a Weapon* in the 1st Degree, a Class B Felony, in violation of Section 265.04 Sub. 1 of the New York State Penal Law.

COUNT ONE:

The facts upon which this FELONY COMPLAINT is based are as follows:

On or about the above date and time, at the above location, the aforesaid defendant did:

- ☒ Sub 1: possess any explosive substance with the intent to use same unlawfully against the person or property of another; and/or
☐ Sub 2: possess ten or more firearms

Additional facts in this case are as follows:

Defendant did, while acting alone or in concert with another or others, possess any explosive substance, to wit: an improvised explosive device in the shape of a mason jar wrapped in duct tape, with intent to use the same unlawfully against the person or property of another, to wit: The persons and property of the Hamlet of Islamberg, County of Delaware, State of New York

ALL CONTRARY TO THE PROVISIONS OF THE STATUTE IN SUCH CASE MADE AND PROVIDED.

WHEREFORE, the Deponent requests that the Defendant be dealt with in accordance with law.

Any applicable depositions and/or certified records are attached hereto and made part of this Felony Complaint

VERIFICATION BY SUBSCRIPTION & NOTICE, NYS PENAL LAW SECTION 210.45 It is a Class A Misdemeanor under the laws of the State of New York, for a person, in and by a written instrument, to knowingly make a false statement, or to make a statement which such person does not believe to be true.

CR# 19003418

AFFIRMED UNDER PENALTY OF PERJURY THIS:

ARRAIGNMENT DATE: _____

19th DAY OF January, 2018

[Signature]
DEPONENT

Please take notice that the People intend to offer at the trial of the defendant(s):

☒ Evidence of a statement by the defendant made to a public servant: ☒ oral ☐ written (see attached)

Time: 3:30pm Date: 01/18/19 Place: 6 Vince Tofany Blvd.

☐ Testimony identifying the defendant as the person who committed the offense charged, to be given by a witness who has previously identified the defendant as such.

Time: _____ Date: _____ Place: _____

The People of the State of New York
against

Defendant

08/22/02

DOB

FELONY COMPLAINT

Criminal Possession of a Weapon 1st Degree
New York State Penal Law
Section 265.04 Sub 1
Class B Felony

THAT Sergeant Brandon White Of Greece Police Department

By this FELONY COMPLAINT, makes written accusation as follows:

THAT [REDACTED] Of 58 Milford Street, Greece, NY

did, at or about 11:00 ☐ AM ☒ PM Date: January 18th, 2019

at: 58 Milford Street, Town of Greece, New York did commit the offense

of *Criminal Possession of a Weapon in the 1st Degree, a Class B Felony*, in violation of Section 265.04 Sub. 1 of the New York State Penal Law.

COUNT ONE:

The facts upon which this FELONY COMPLAINT is based are as follows:

On or about the above date and time, at the above location, the aforesaid defendant did:

- ☒ Sub 1: possess any explosive substance with the intent to use same unlawfully against the person or property of another; and/or
☐ Sub 2: possess ten or more firearms

Additional facts in this case are as follows:

Defendant did, while acting alone or in concert with another or others, possess any explosive substance, to wit: an improvised explosive device in the shape of a large sized cylinder wrapped in duct tape, with intent to use the same unlawfully against the person or property of another, to wit: The persons and property of the Hamlet of Islamberg, County of Delaware, State of New York

ALL CONTRARY TO THE PROVISIONS OF THE STATUTE IN SUCH CASE MADE AND PROVIDED.

WHEREFORE, the Deponent requests that the Defendant be dealt with in accordance with law.

Any applicable depositions and/or certified records are attached hereto and made part of this Felony Complaint

VERIFICATION BY SUBSCRIPTION & NOTICE, NYS PENAL LAW SECTION 210.45 It is a Class A Misdemeanor under the laws of the State of New York, for a person, in and by a written instrument, to knowingly make a false statement, or to make a statement which such person does not believe to be true.

CR# 19003418

AFFIRMED UNDER PENALTY OF PERJURY THIS:

ARRAIGNMENT DATE: _____

19th DAY OF January, 2018

[Signature]
DEPONENT

Please take notice that the People intend to offer at the trial of the defendant(s):

☒ Evidence of a statement by the defendant made to a public servant: ☒ oral ☐ written (see attached)

Time: 3:30pm Date: 01/18/19 Place: 6 Vince Tofany Blvd.

☐ Testimony identifying the defendant as the person who committed the offense charged, to be given by a witness who has previously identified the defendant as such.

Time: _____ Date: _____ Place: _____

The People of the State of New York
against

Defendant

08/22/02

DOB

FELONY COMPLAINT

Criminal Possession of a Weapon 1st Degree
New York State Penal Law
Section 265.04 Sub 1
Class B Felony

THAT Sergeant Brandon White Of Greece Police Department

By this FELONY COMPLAINT, makes written accusation as follows:

THAT [REDACTED] Of 58 Milford Street, Greece, NY

did, at or about 11:00 ☐ AM ☒ PM Date: January 18th, 2019

at: 58 Milford Street, Town of Greece, New York did commit the offense

of *Criminal Possession of a Weapon in the 1st Degree, a Class B Felony*, in violation of Section 265.04 Sub. 1 of the New York State Penal Law.

COUNT ONE:

The facts upon which this FELONY COMPLAINT is based are as follows:

On or about the above date and time, at the above location, the aforesaid defendant did:

- ☒ Sub 1: possess any explosive substance with the intent to use same unlawfully against the person or property of another; and/or
☐ Sub 2: possess ten or more firearms

Additional facts in this case are as follows:

Defendant did, while acting alone or in concert with another or others, possess any explosive substance, to wit: an improvised explosive device in the shape of a medium sized cylinder wrapped in duct tape, with intent to use the same unlawfully against the person or property of another, to wit: The persons and property of the Hamlet of Islamberg, County of Delaware, State of New York

ALL CONTRARY TO THE PROVISIONS OF THE STATUTE IN SUCH CASE MADE AND PROVIDED.

WHEREFORE, the Deponent requests that the Defendant be dealt with in accordance with law.

Any applicable depositions and/or certified records are attached hereto and made part of this Felony Complaint

VERIFICATION BY SUBSCRIPTION & NOTICE, NYS PENAL LAW SECTION 210.45 It is a Class A Misdemeanor under the laws of the State of New York, for a person, in and by a written instrument, to knowingly make a false statement, or to make a statement which such person does not believe to be true.

CR# 19003418

AFFIRMED UNDER PENALTY OF PERJURY THIS:

ARRAIGNMENT DATE: _____

19th DAY OF January, 2018

Brandon White
DEPONENT

Please take notice that the People intend to offer at the trial of the defendant(s):

☒ Evidence of a statement by the defendant made to a public servant: ☒ oral ☐ written (see attached)

Time: 3:30pm Date: 01/18/19 Place: 6 Vince Tofany Blvd.

☐ Testimony identifying the defendant as the person who committed the offense charged, to be given by a witness who has previously identified the defendant as such.

Time: _____ Date: _____ Place: _____

State of New York

County of Monroe

Town of Greece

The People of the State of New York
against

Defendant

08/22/02

DOB

FELONY COMPLAINTConspiracy in the Fourth Degree
New York State Penal Law
Section 105.10 Sub 1
Class E FelonyTHAT Sergeant Brandon White Of Greece Police DepartmentBy this **FELONY COMPLAINT**, makes written accusation as follows:THAT [REDACTED] Of 58 Milford Street, Greece, NYdid, at or about --- ☐ AM ☐ PM Date: 11/09/18 - 01/18/19at: 58 Milford Street, Town of Greece, New York did commit the offense of Conspiracy in the Fourth Degree, a Class E Felony, in violation of Section 105.10 Sub 1 of the New York State Penal Law.**Count One:**

A person is guilty of conspiracy in the fourth degree when, with intent that conduct constituting:

- ☒ 1: a class B or C felony be performed, the defendant did agree with one or more persons to engage in or cause the performance of such conduct; and/or
- ☐ 2: a felony be performed, the defendant did, being over eighteen years of age, agree with one or more persons under the sixteen years of age to engage in or cause the performance of such conduct; and/or
- ☐ 3: the felony of money laundering in the third degree as defined in section 470.10 of this chapter, be performed, the defendant agreed with one or more persons to engage in or cause the performance of such conduct.

The facts upon which this **FELONY COMPLAINT** is based are as follows;

On or about the above date and time, at the above location, the aforesaid defendant did:

Defendant, with intent that conduct constituting a class B felony be performed, to wit: Criminal Possession of a Weapon in the First Degree, did agree with one or more persons to engage in or cause the performance of such conduct. In furtherance of the conspiracy, at least one overt act was committed by one of the conspirators, to wit: possession of an explosive substance.

ALL CONTRARY TO THE PROVISIONS OF THE STATUTE IN SUCH CASE MADE AND PROVIDED.

WHEREFORE, the Deponent requests that the Defendant be dealt with in accordance with law.

Any applicable depositions and/or certified records are attached hereto and made part of this Felony Complaint.

VERIFICATION BY SUBSCRIPTION & NOTICE, NYS PENAL LAW SECTION 210.45 It is a Class A Misdemeanor under the laws of the State of New York, for a person, in and by a written instrument, to knowingly make a false statement, or to make a statement which such person does not believe to be true.CR# 19003418

AFFIRMED UNDER PENALTY OF PERJURY THIS:

ARRAIGNMENT DATE: 19th DAY OF January, 2019[Signature]
DEPONENT

Please take notice that the People intend to offer at the trial of the defendant(s):

- ☒ Evidence of a statement by the defendant made to a public servant: ☒ oral ☐ written (see attached)
Time: 3:30pm Date: 01/18/19 Place: 6 Vince Tofany Blvd.
- ☐ Testimony identifying the defendant as the person who committed the offense charged, to be given by a witness who has previously identified the defendant as such.
Time: Date: Place:

Exhibit B

STATE OF NEW YORK
COUNTY COURT

COUNTY OF MONROE

THE PEOPLE OF THE STATE OF NEW YORK

No. 0099

-vs-

BRIAN COLANERI AKA LORD_VALKOR, ANDREW CRYSEL AKA REK, VINCENT
VETROMILE AKA ROBERT BRUTMAN AND [REDACTED] AKA
TREADONTHEM

FIRST COUNT

THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, accuses the
defendants, BRIAN COLANERI AKA LORD_VALKOR, ANDREW CRYSEL AKA REK,
VINCENT VETROMILE AKA ROBERT BRUTMAN AND [REDACTED] AKA
TREADONTHEM, of the crime of Conspiracy in the Second Degree as a Crime of Terrorism, in
violation of Sections 105.15 and 490.25, Subdivision 1 of the Penal Law of the State of New York,
committed as follows:

The defendants, on or about and between September 13, 2018 and January 18, 2019, in the
County of Monroe, State of New York, with intent to intimidate or coerce a civilian population and
with intent that conduct constituting a class A felony be performed, to wit: Murder in the Second
Degree, in violation of Section 125.25, Subdivision 1 of the Penal Law of the State of New York,
agreed with each other and/or one or more persons to engage in or cause the performance of such
conduct, and that pursuant to said agreement such overt acts were committed in furtherance of the
conspiracy by the defendants or one or more persons with whom he or she agreed with. Such overt
acts include but are not limited to:

1. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri
aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert

- Brutman" and [REDACTED] aka "treadonthem" posted messages to the "#leaders-only" channel on the communication medium known as "Discord;"
- and/or 2. On or about and between November 9, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" posted messages to the "#militia-soldiers-wanted" channel on the communication medium known as "Discord;"
- and/or 3. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed plans to possess weaponry;
- and/or 4. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed plans to use weaponry;
- and/or 5. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed the roles of each participant as it related to their planned attack of "Islamberg;"
- and/or 6. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed means of manufacturing ammunition;

- and/or 7. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed the location known as "Islamberg;"
- and/or 8. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed the demographic makeup of the location known as "Islamberg;"
- and/or 9. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" communicated a desire and/or intention to acquire explosive devices;
- and/or 10. On or about and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" possessed explosive devices at 58 Milford Street, Town of Greece, State of New York.
- and/or 11. On or about January 18, 2019, [REDACTED] aka "treadonthem" possessed .22 caliber ammunition at 58 Milford Street, Town of Greece, State of New York;
- and/or 12. On or about January 18, 2019, [REDACTED] aka "treadonthem" possessed sketches of bombs at 58 Milford Street, Town of Greece, State of New York;

- and/or 13. On or about January 18, 2019, [REDACTED] aka "treadonthem" possessed materials used to manufacture explosive devices at 58 Milford Street, Town of Greece, State of New York;
- and/or 14. On or about January 19, 2019, [REDACTED] aka "treadonthem" possessed a rifle scope at 4625 Mt. Read Boulevard, Town of Greece, State of New York;
- and/or 15. On or about January 19, 2019, [REDACTED] aka "treadonthem" possessed materials used to manufacture explosive devices at 4625 Mt. Read Boulevard, Town of Greece, State of New York;
- and/or 16. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed assorted ammunition at 111 Chalford Road, Town of Greece, State of New York;
- and/or 17. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed magazines loaded with ammunition at 111 Chalford Road, Town of Greece, State of New York;
- and/or 18. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed eleven (11) rifles and/or shotguns at 111 Chalford Road, Town of Greece, State of New York;
- and/or 19. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed a black powder pistol at 111 Chalford Road, Town of Greece, State of New York;
- and/or 20. On or about January 18, 2019, Andrew Crysel aka "Rek" possessed assorted ammunition at 137 E. Ivy Street, Village of East Rochester, State of New York;

- and/or 19. On or about January 18, 2019, Andrew Crysel aka "Rek" possessed magazines loaded with ammunition at 137 E. Ivy Street, Village of East Rochester, State of New York;
- and/or 21. On or about January 18, 2019, Andrew Crysel aka "Rek" possessed nine (9) rifles and/or shotguns at 137 E. Ivy Street, Village of East Rochester, State of New York;
- and/or 22. On or about January 19, 2019, Andrew Crysel aka "Rek" possessed a rifle at 6120 Wilkins Tract, Town of Livonia, State of New York.

SECOND COUNT:

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, BRIAN COLANERI AKA LORD_VALKOR, ANDREW CRYSEL AKA REK, VINCENT VETROMILE AKA ROBERT BRUTMAN AND [REDACTED] AKA TREADONTHEM, of the crime of Conspiracy in the Fourth Degree as a Crime of Terrorism, in violation of Sections 105.10, Subdivision 1 and 490.25, Subdivision 1 of the Penal Law of the State of New York, committed as follows:

The defendants, on or about and between September 13, 2018 and January 18, 2019, in the County of Monroe, State of New York, with intent to intimidate or coerce a civilian population and with intent that conduct constituting a Class B felony be performed, to wit: Assault in the First Degree, in violation of Section 120.10, Subdivision 1 of the Penal Law of the State of New York, agreed with each other and/or one or more persons to engage in or cause the performance of such conduct, and that pursuant to said agreement such overt acts were committed in furtherance of the

conspiracy by the defendants or one or more persons with whom he or she agreed with. Such overt acts include but are not limited to:

1. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" posted messages to the "#leaders-only" channel on the communication medium known as "Discord;"
- and/or 2. On or about and between November 9, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" posted messages to the "#militia-soldiers-wanted" channel on the communication medium known as "Discord;"
- and/or 3. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed plans to possess weaponry;
- and/or 4. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed plans to use weaponry;

- and/or 5. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed the roles of each participant as it related to their planned attack of "Islamberg;"
- and/or 6. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed means of manufacturing ammunition;
- and/or 7. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed the location known as "Islamberg;"
- and/or 8. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed the demographic makeup of the location known as "Islamberg;"
- and/or 9. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" communicated a desire and/or intention to acquire explosive devices;

- and/or 10. On or about January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" possessed explosive devices at 58 Milford Street, Town of Greece, State of New York.
- and/or 11. On or about January 18, 2019, [REDACTED] aka "treadonthem" possessed .22 caliber ammunition at 58 Milford Street, Town of Greece, State of New York;
- and/or 12. On or about January 18, 2019, [REDACTED] aka "treadonthem" possessed sketches of bombs at 58 Milford Street, Town of Greece, State of New York;
- and/or 13. On or about January 18, 2019, [REDACTED] Pheilshifter aka "treadonthem" possessed materials used to manufacture explosive devices at 58 Milford Street, Town of Greece, State of New York;
- and/or 14. On or about January 19, 2019, [REDACTED] aka "treadonthem" possessed a rifle scope at 4625 Mt. Read Boulevard, Town of Greece, State of New York;
- and/or 15. On or about January 19, 2019, [REDACTED] aka "treadonthem" possessed materials used to manufacture explosive devices at 4625 Mt. Read Boulevard, Town of Greece, State of New York;
- and/or 16. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed assorted ammunition at 111 Chalford Road, Town of Greece, State of New York;
- and/or 17. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed magazines loaded with ammunition at 111 Chalford Road, Town of Greece, State of New York;

- and/or 18. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed eleven (11) rifles and/or shotguns at 111 Chalford Road, Town of Greece, State of New York;
- and/or 19. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed a black powder pistol at 111 Chalford Road, Town of Greece, State of New York;
- and/or 20. On or about January 18, 2019, Andrew Crysel aka "Rek" possessed assorted ammunition at 137 E. Ivy Street, Village of East Rochester, State of New York;
- and/or 19. On or about January 18, 2019, Andrew Crysel aka "Rek" possessed magazines loaded with ammunition at 137 E. Ivy Street, Village of East Rochester, State of New York;
- and/or 21. On or about January 18, 2019, Andrew Crysel aka "Rek" possessed nine (9) rifles and/or shotguns at 137 E. Ivy Street, Village of East Rochester, State of New York;
- and/or 22. On or about January 19, 2019, Andrew Crysel aka "Rek" possessed a rifle at 6120 Wilkins Tract, Town of Livonia, State of New York.

THIRD COUNT:

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendant, BRIAN COLANERI AKA LORD_VALKOR, ANDREW CRYSEL AKA REK, VINCENT VETROMILE AKA ROBERT BRUTMAN AND [REDACTED] AKA TREADONTHEM, of the crime of Conspiracy in the Fourth Degree, in violation of Section 105.10, Subdivision 1 of the Penal Law of the State of New York, committed as follows:

The defendants, on or about and between September 13, 2018 and January 18, 2019, in the County of Monroe, State of New York, with intent that conduct constituting a Class B felony be

performed, to wit: Criminal Mischief in the First Degree, in violation of Section 145.12 of the Penal Law of the State of New York, agreed with each other and/or one or more persons to engage in or cause the performance of such conduct, and that pursuant to said agreement such overt acts were committed in furtherance of the conspiracy by the defendants or one or more persons with whom he or she agreed with. Such overt acts include but are not limited to:

1. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" posted messages to the "#leaders-only" channel on the communication medium known as "Discord;"
- and/or 2. On or about and between November 9, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" posted messages to the "#militia-soldiers-wanted" channel on the communication medium known as "Discord;"
- and/or 3. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed plans to possess weaponry;
- and/or 4. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed plans to use weaponry;

- and/or 5. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed the roles of each participant as it related to their planned attack of "Islamberg;"
- and/or 6. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed means of manufacturing ammunition;
- and/or 7. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed the location known as "Islamberg;"
- and/or 8. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" discussed the demographic makeup of the location known as "Islamberg;"
- and/or 9. On or about and between September 13, 2018, and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED] aka "treadonthem" communicated a desire and/or intention to acquire explosive devices;
- and/or 10. On or about and January 18, 2019, Brian Colaneri aka "Lord_Valkor," Andrew Crysel aka "Rek," Vincent Vetromile aka "Robert Brutman" and [REDACTED]

██████████ aka "treadonthem" possessed explosive devices at 58 Milford Street, Town of Greece, State of New York.

- and/or 11. On or about January 18, 2019, ██████████ aka "treadonthem" possessed .22 caliber ammunition at 58 Milford Street, Town of Greece, State of New York;
- and/or 12. On or about January 18, 2019, ██████████ aka "treadonthem" possessed sketches of bombs at 58 Milford Street, Town of Greece, State of New York;
- and/or 13. On or about January 18, 2019, ██████████ aka "treadonthem" possessed materials used to manufacture explosive devices at 58 Milford Street, Town of Greece, State of New York;
- and/or 14. On or about January 19, 2019, ██████████ aka "treadonthem" possessed a rifle scope at 4625 Mt. Read Boulevard, Town of Greece, State of New York;
- and/or 15. On or about January 19, 2019, ██████████ aka "treadonthem" possessed materials used to manufacture explosive devices at 4625 Mt. Read Boulevard, Town of Greece, State of New York;
- and/or 16. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed assorted ammunition at 111 Chalford Road, Town of Greece, State of New York;
- and/or 17. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed magazines loaded with ammunition at 111 Chalford Road, Town of Greece, State of New York;
- and/or 18. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed eleven (11) rifles and/or shotguns at 111 Chalford Road, Town of Greece, State of New York;

- and/or 19. On or about January 18, 2019, Vincent Ventromile aka "Robert Brutman" possessed a black powder pistol at 111 Chalford Road, Town of Greece, State of New York;
- and/or 20. On or about January 18, 2019, Andrew Crysel aka "Rek" possessed assorted ammunition at 137 E. Ivy Street, Village of East Rochester, State of New York;
- and/or 19. On or about January 18, 2019, Andrew Crysel aka "Rek" possessed magazines loaded with ammunition at 137 E. Ivy Street, Village of East Rochester, State of New York;
- and/or 21. On or about January 18, 2019, Andrew Crysel aka "Rek" possessed nine (9) rifles and/or shotguns at 137 E. Ivy Street, Village of East Rochester, State of New York;
- and/or 22. On or about January 19, 2019, Andrew Crysel aka "Rek" possessed a rifle at 6120 Wilkins Tract, Town of Livonia, State of New York.

FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, BRIAN COLANERI AKA LORD_VALKOR, ANDREW CRYSEL AKA REK, VINCENT VETROMILE AKA ROBERT BRUTMAN AND [REDACTED] AKA TREADONTHEM, of the crime of Criminal Possession of a Weapon in the First Degree as a Crime of Terrorism, in violation of Sections 20.00, 265.04, Subdivision 1 and 490.25, Subdivision 1 of the Penal Law of the State of New York, committed as follows:

The defendants, on or about January 18, 2019, in the County of Monroe, State of New York, while acting alone or in concert with another or others, with intent to intimidate or coerce a civilian population, knowingly possessed any explosive substance, to wit: a glass jar with lid, an Improvised Explosive Device (IED), with intent to use the same unlawfully against the person or property of another, to wit: The Muslims of America, Inc. and/or the residents of 2732 Roods Creek Rd., Hancock, New York (aka "Islamberg").

FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, BRIAN COLANERI AKA LORD_VALKOR, ANDREW CRYSEL AKA REK, VINCENT VETROMILE AKA ROBERT BRUTMAN AND [REDACTED] AKA TREADONTHEM, of the crime of Criminal Possession of a Weapon in the First Degree as a Crime of Terrorism, in violation of Sections 20.00, 265.04, Subdivision 1 and 490.25, Subdivision 1 of the Penal Law of the State of New York, committed as follows:

The defendants, on or about January 18, 2019, in the County of Monroe, State of New York, while acting alone or in concert with another or others, with intent to intimidate or coerce a civilian population, knowingly possessed any explosive substance, to wit: a cardboard tube, sparkler, an Improvised Explosive Device (IED), with intent to use the same unlawfully against the person or property of another, to wit: The Muslims of America, Inc. and/ or the residents of 2732 Roods Creek Rd., Hancock, New York (aka "Islamberg").

SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF MONROE, by this indictment, further accuses the defendants, BRIAN COLANERI AKA LORD_VALKOR, ANDREW CRYSEL AKA REK, VINCENT VETROMILE AKA ROBERT BRUTMAN AND [REDACTED] AKA TREADONTHEM, of the crime of Attempt to Commit the Crime of Criminal Possession of a Weapon in the First Degree as a Crime of Terrorism, in violation of Sections 20.00, 110.00, 265.04, Subdivision 1 and 490.25, Subdivision 1 of the Penal Law of the State of New York, committed as follows:

The defendants, on or about January 18, 2019, in the County of Monroe, State of New York, while acting alone or in concert with another or others, with intent to intimidate or coerce a civilian population, attempted to knowingly possess any explosive substance, to wit: a plastic tube with caps

and debris, a partially assembled Improvised Explosive Device (IED), with intent to use the same unlawfully against the person or property of another, to wit: The Muslims of America, Inc. and/or the residents of 2732 Roods Creek Rd., Hancock, New York (aka "Islamberg").

SANDRA DOORLEY
DISTRICT ATTORNEY OF MONROE COUNTY

Exhibit C

My name is [REDACTED]. I am 15 $\frac{1}{2}$.
I live at [REDACTED]. On 2.8.19, my
attorney and I met with people from the
Monroe County District Attorney's office so
they could ask me some questions. We talked
about my friend [REDACTED] and
I have known each other for years. We met in
Boy Scouts. We've been to each other's houses
numerous times. Last year, in November of 2018
(or possibly a little longer ago than that), I
was visiting [REDACTED] at his mom's house on
Milford St. in Greece. We were hanging out
in the kitchen when [REDACTED] walked into the
hall. I assume he went to his room, because
only his room & the bathroom are ^{rooms} off the ^{T.A.} hall. He came back and had what looked like
[REDACTED] with doors. I heard a door open. T.A. [REDACTED]

NOTICE: FALSE STATEMENTS MADE HEREIN ARE PUNISHABLE AS A CLASS A
MISDEMEANOR PURSUANT TO SECTION 210.45 OF THE NEW YORK STATE PENAL
LAW.

DEPONENT: [REDACTED]

(DATE)

2/8/19

WITNESS: [REDACTED]

2.8.19

a bomb in his hand. It looked like a piece of PVC pipe covered in a dark tape that I assume was duct tape. I didn't know what it was until I saw a $\frac{1}{2}$ " fuse coming out of one of the ends. [REDACTED] told me it was a prototype bomb. He said it didn't have any "black powder" in it. [REDACTED] took the prototype back down the hall, [REDACTED] assume to his room.

A week or so later, I was at [REDACTED] mom's house again. We were in the living room. [REDACTED] said "let me show you what Vinnie gave me." (Vinnie is Vincent Vetromile, one of our friends). He went down the hall and came back with a keg of black powder. It was in a black plastic container. Black powder is an explosive,

T.A.
CME

NOTICE: FALSE STATEMENTS MADE HEREIN ARE PUNISHABLE AS A CLASS A MISDEMEANOR PURSUANT TO SECTION 210.45 OF THE NEW YORK STATE PENAL LAW.

DEPONENT: [REDACTED]

(DATE)

2/8/19

WITNESS:

[Signature]

2.8.19

sort of like gunpowder. He said Vinnie got it for him from some store. He walked down the hall & put it back, presumably in his room (I heard the door).

I also recall [REDACTED] telling me Vinnie had asked him to make prototypes. I am not sure exactly when [REDACTED] told me this. T.A. CME

NOTICE: FALSE STATEMENTS MADE HEREIN ARE PUNISHABLE AS A CLASS A MISDEMEANOR PURSUANT TO SECTION 210.45 OF THE NEW YORK STATE PENAL LAW.

DEPONENT: [REDACTED]

2-8-19

(DATE)

WITNESS: [REDACTED]

2-8-19

Exhibit D

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**FBI Laboratory**2501 Investigation Parkway
Quantico, Virginia 221354940 Fowler Road
Huntsville, Alabama 35898**LABORATORY REPORT**

To: [REDACTED]

Date: February 7, 2019

Case ID No.: [REDACTED]

Lab No.: [REDACTED]

Communication(s): January 23, 2019

Agency Reference(s):

Subject(s): Vincent Vetromile; [REDACTED] Andrew Crysai; Brian Colaneri

Victim(s):

Discipline(s): Explosives Device

FBI Laboratory Evidence Designator(s):

Item 1	Glass jar with lid (1B1, E5619553)
Item 1-1	Nails and metal balls (1B1, E5619553)
Item 1-1-1	Tape removed from Item 1 (1B1, E5619553)
Item 1-2	Paper (1B1, E5619553)
Item 1-2-1	Tape removed from Item 1-2 (1B1, E5619553)
Item 1-3	Grey colored powder
Item 1-3-1	Sample of powder from Item 1-3
Item 1-4	Tape removed from Item 1 (1B1, E5619553)
Item 1-5	Tape removed from Item 1 (1B1, E5619553)
Item 2	Plastic tube with caps and debris (1B2, E5619554)
Item 2-1	Grey colored powder
Item 2-2	Tape removed from Item 2 (1B2, E5619554)
Item 3	Cardboard tube, sparkler (1B3, E5619555)
Item 3-1	Sparklers
Item 3-1-1	Tape removed from Item 3-1 (1B3, E5619555)
Item 3-1-2	Tape removed from Item 3-1 (1B3, E5619555)

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Item 3-2	Yellow colored powder
Item 3-2-1	Sample of powder from Item 3-2
Item 3-3	Tape removed from Item 3 (1B3, E5619555)
Item 3-4	Tape removed from Item 3 (1B3, E5619555)
Item 4	Trace - Hairs/Fibers Secondary Evidence (13 slide(s))

This report contains the final results of the explosives and hazardous device examinations performed in the Explosives Unit.

Administrative:

Three (3) suspected Improvised Explosive Devices (IED) were recovered during a search warrant executed at 58 Milford Street, Greece, NY on January 18, 2019. The items were collected by FBI Special Agent Bomb Technicians and transported to the Explosive Unit's Charlie Demolition Range where they were rendered safe by Explosive Unit personnel. A render safe procedure (RSP) uses tools to remotely disassemble a suspected live device, thereby making it safe to approach and collect the evidence. Subsequent to the RSP, the items were transported to the FBI Laboratory, Explosive Unit, for examination.

Conclusion:

It is the opinion of this Explosives and Hazardous Devices Examiner that present in the submitted items are two (2) IEDs, and one (1) partially assembled IED. Properly assembled and initiated, these types of devices are capable of causing property damage, personal injury, and/or death.

It is also the opinion of this Explosives and Hazardous Devices Examiner that one (1) of the submitted IEDs (Item 1) is a destructive device because it has specific design characteristics that make it a weapon.

Results of Examination:

Two (2) of the submitted IEDs (Item 1 and Item 3) are complete IEDs with an explosive main charge, non-electric fuzing system and confinement container.

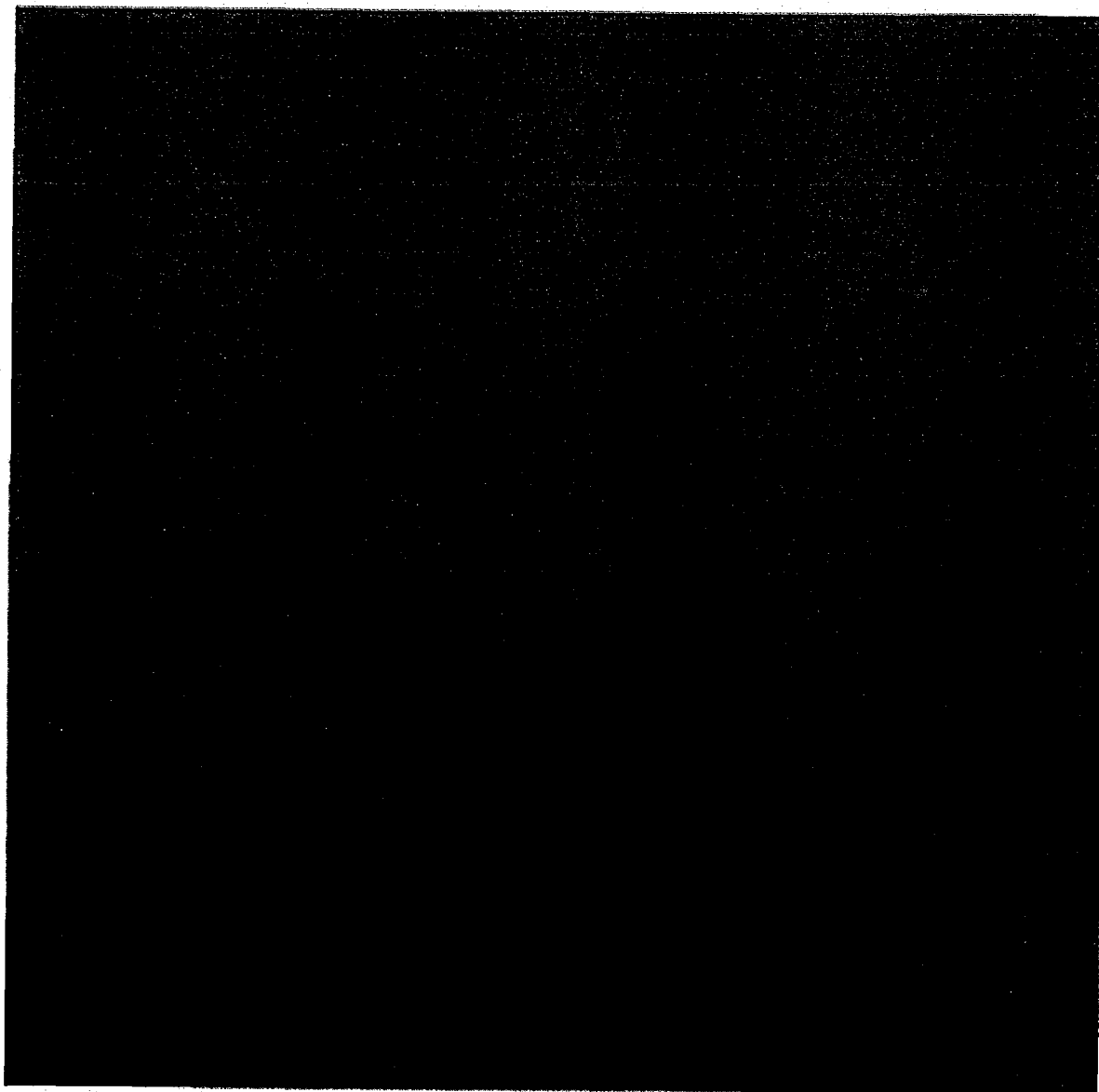
One (1) of the submitted IEDs (Item 2) has residual explosive material in the main charge container, a non-electric fuzing system and confinement container.

A fuzing system is required to provide the stimulus or energy to cause the main charge explosive to function. Each of these IEDs has a non-electric fuzing system utilizing hobby fuse. Hobby fuse consists of a core of low explosive, contained within various textile wrappings to protect it

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from the environment. When initiated by flame, it transmits a burning reaction through the length of the fuse, capable of initiating low explosive powder.

Each of these IEDs incorporates a confinement container. The purpose of a confinement container is to hold the low explosive main charge and to temporarily contain the gases produced from the deflagration of the low explosive. An explosion of the container occurs as the container is overcome by the amount of pressure generated from the reaction. The resulting explosion of these containers would have resulted in container fragments being propelled outward at high velocities.

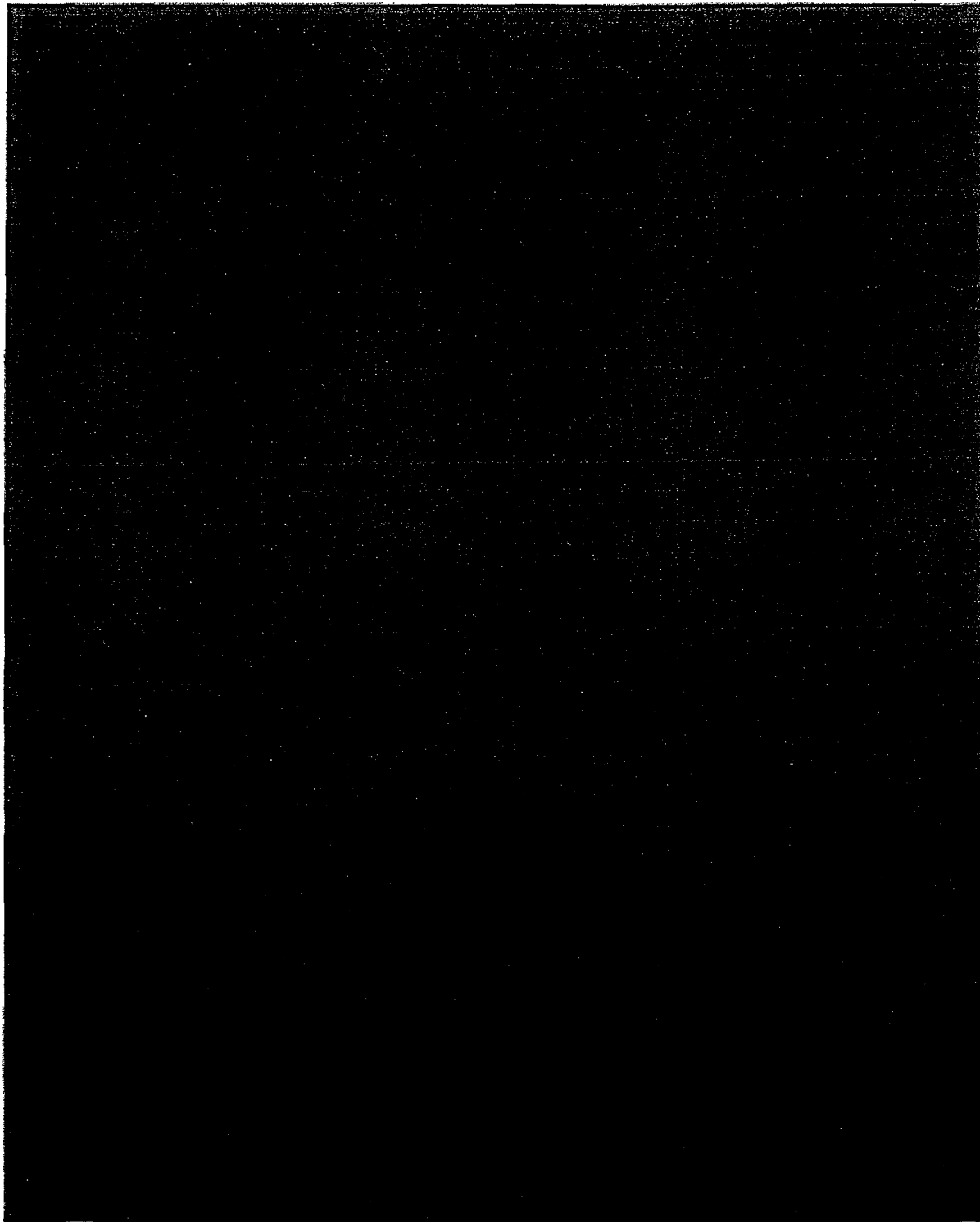


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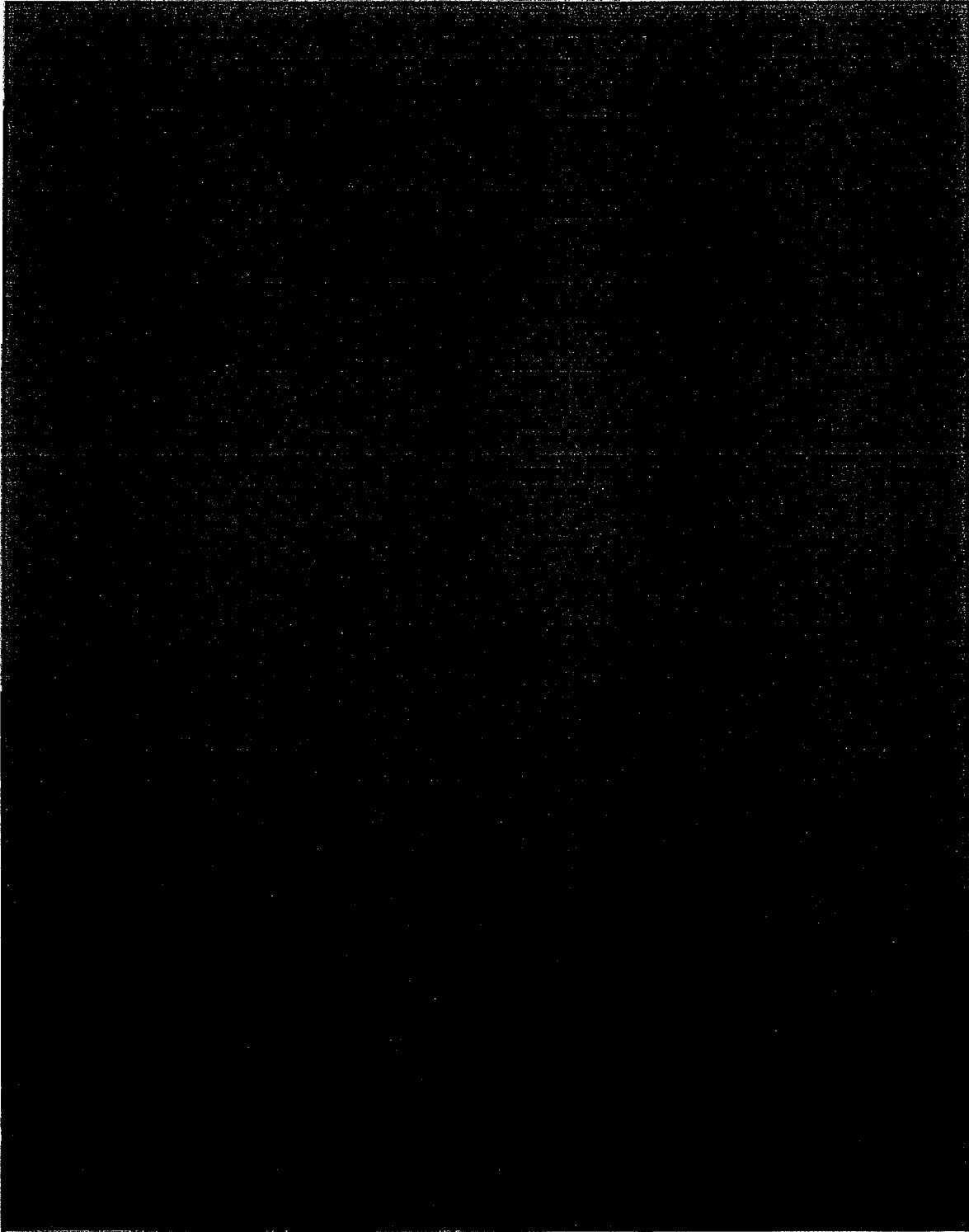


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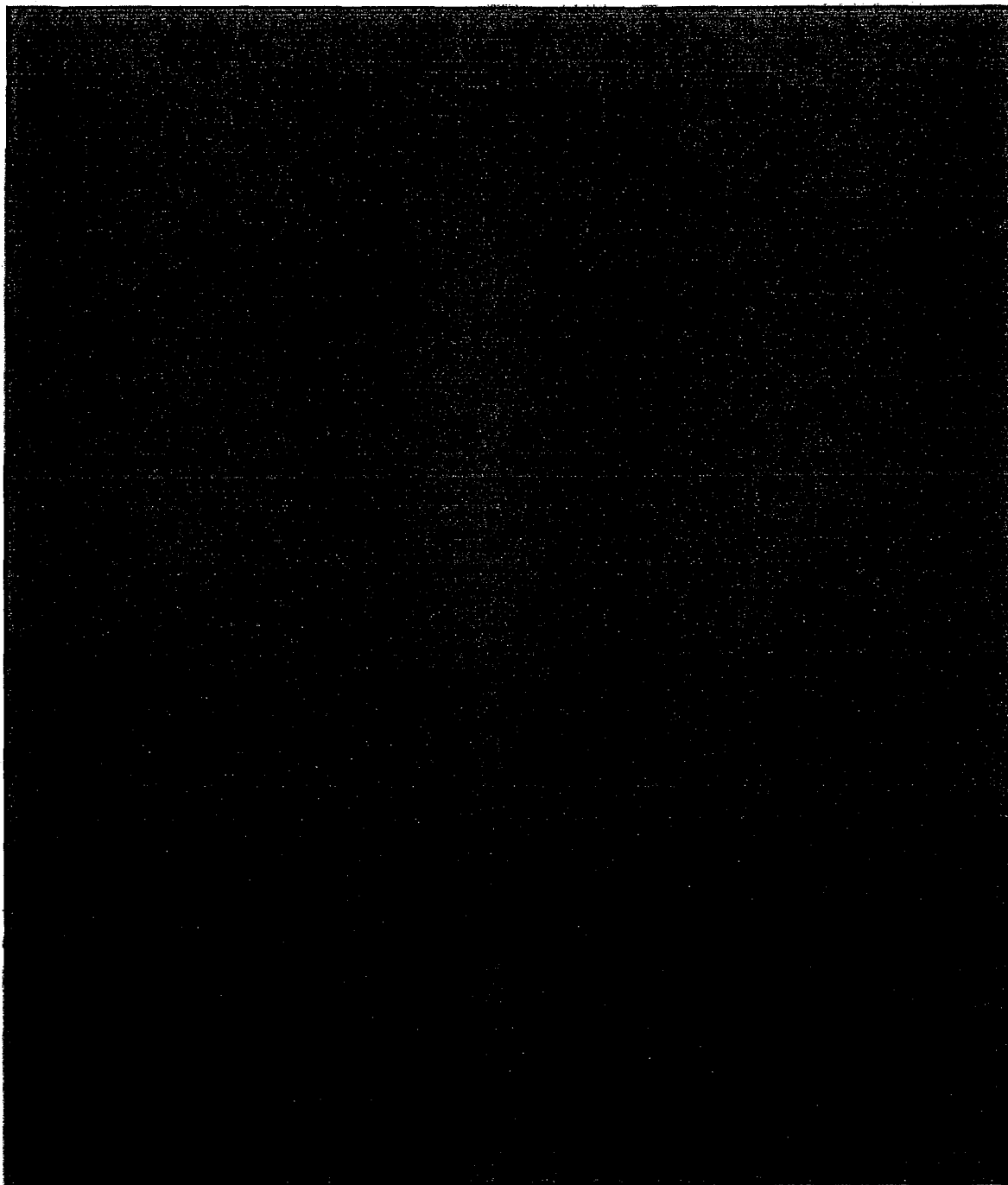


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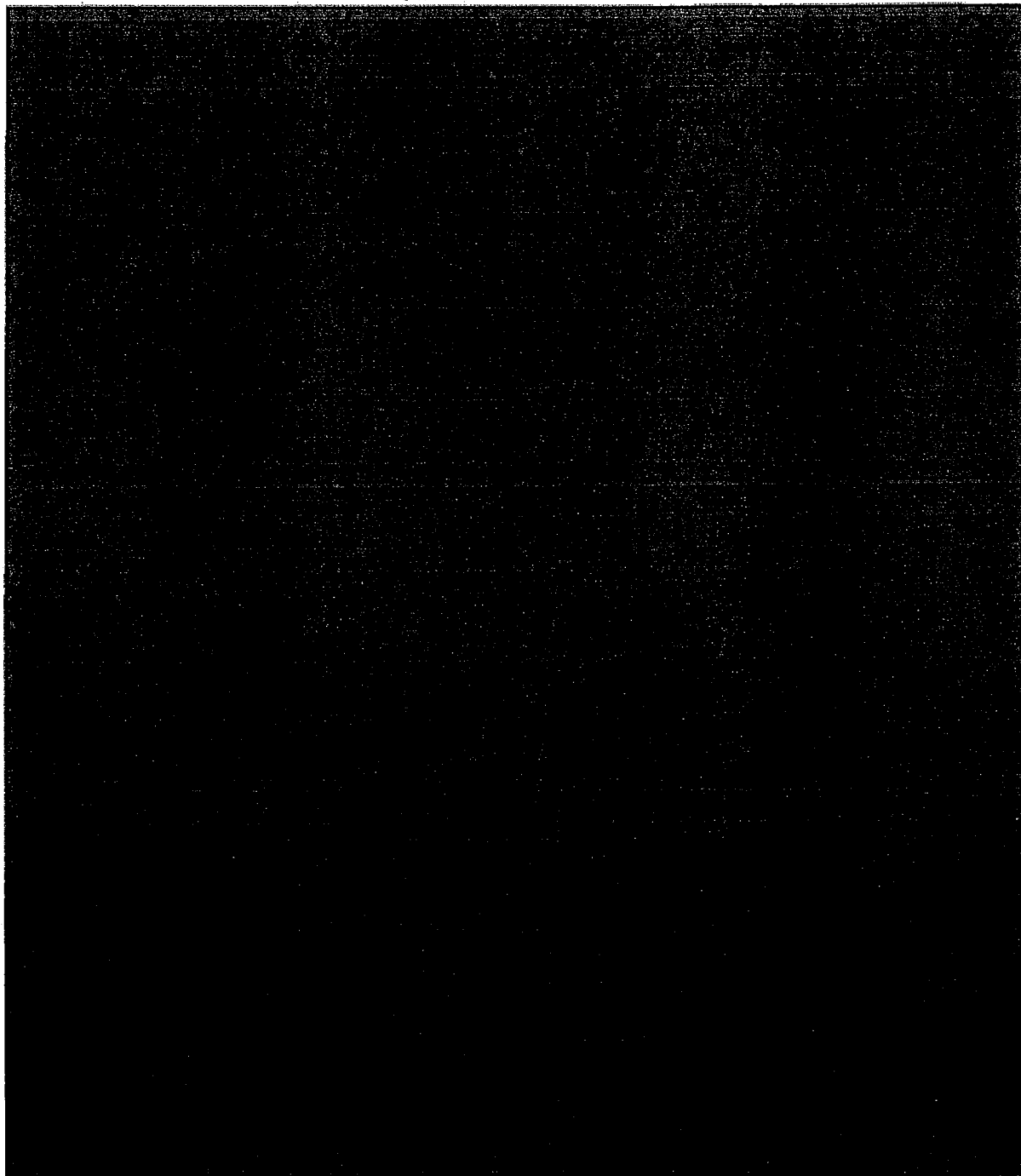


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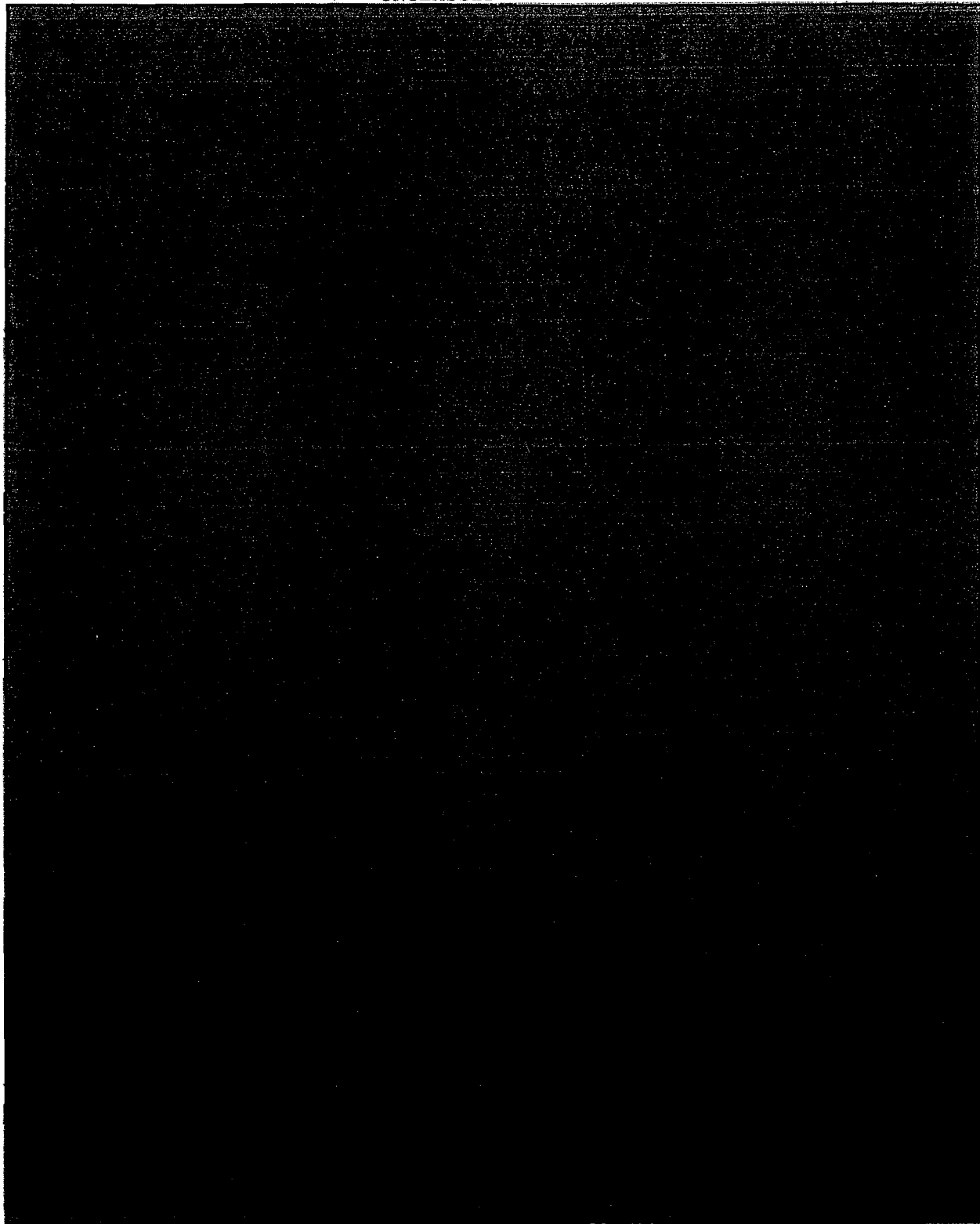


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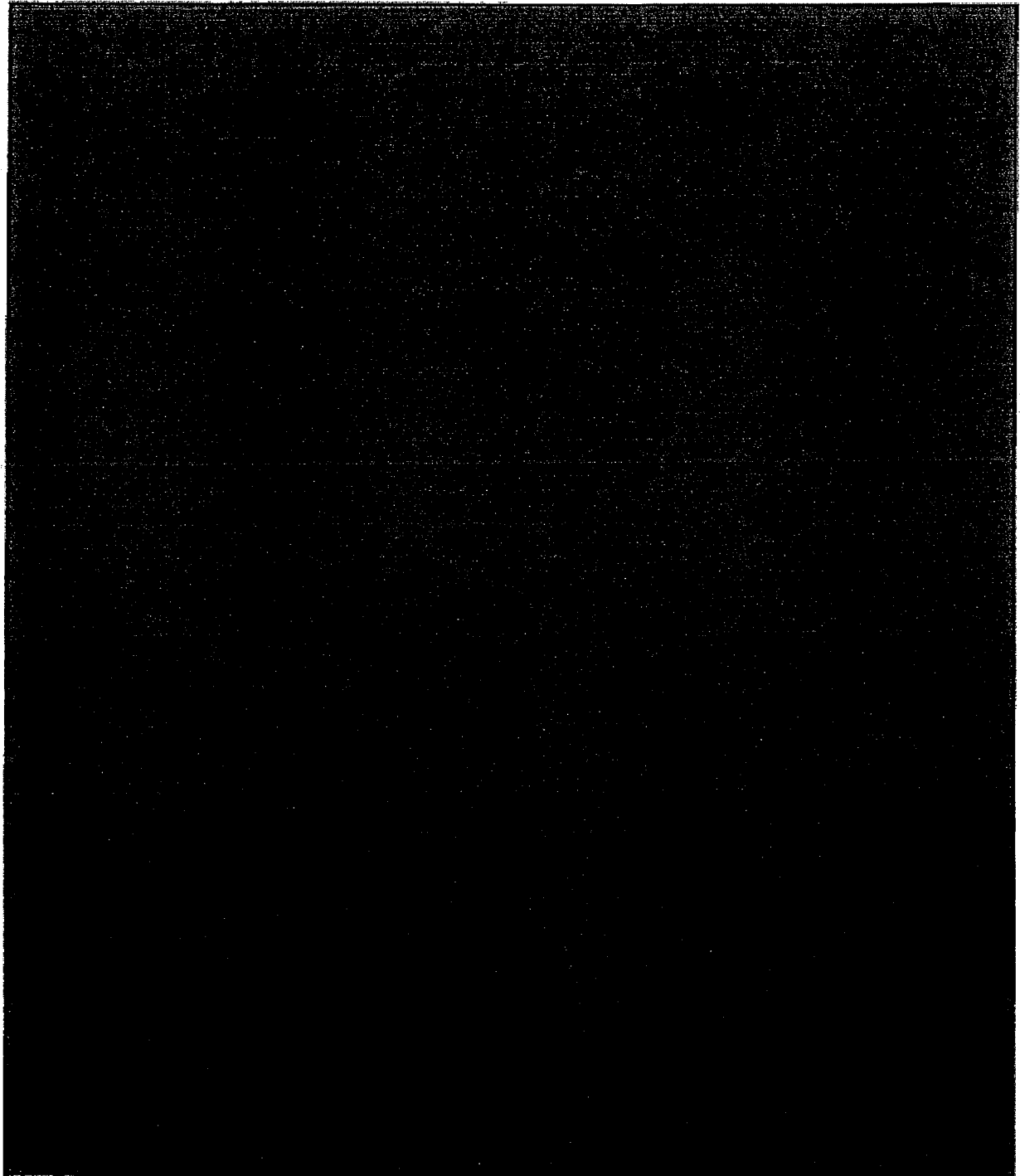


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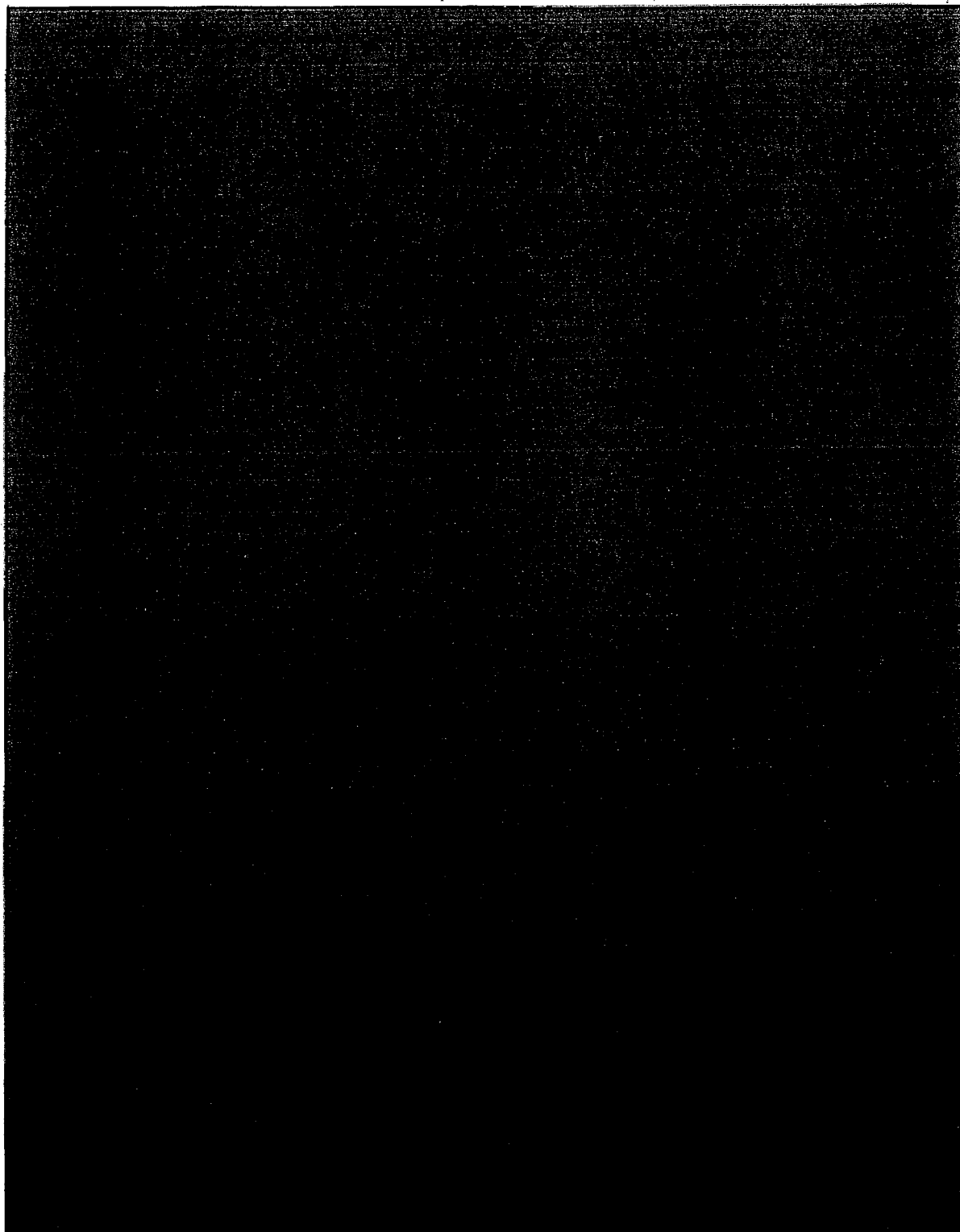


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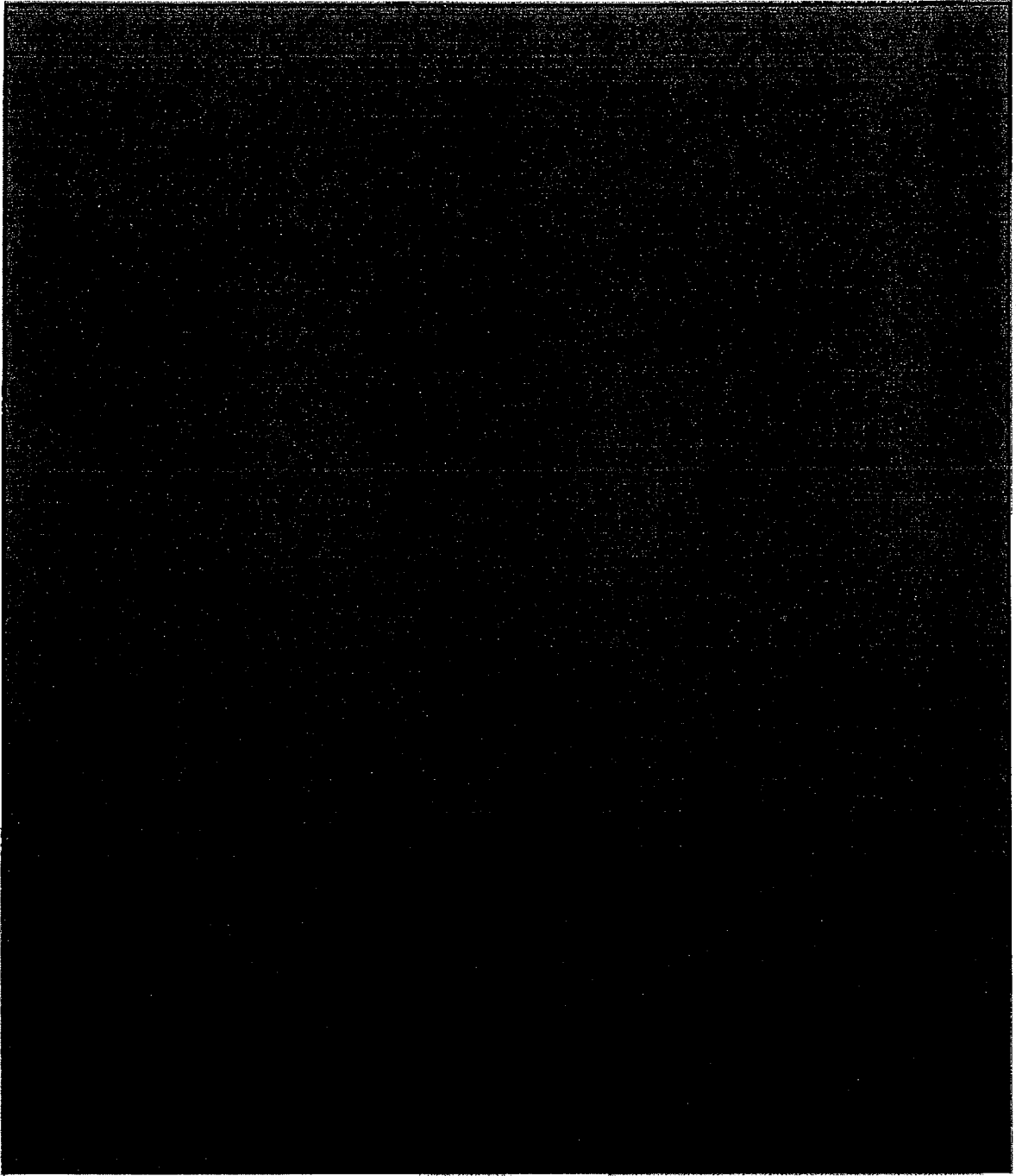


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